

For the vast majority of my amateur radio operation, I use AMphone and CW telegraphy in the 1.8-2.0, 3.5-4.0, 7.0-7.3 and 28-29.7 MHz bands. At present I do not use SSB voice or digital modes other than Morse CW. I support the expansion of existing "phone" privileges.

I have observed that the present subband structure results in inefficient use of our limited amateur radio spectrum allocations. During prime operating hours, there is usually very little traffic on the CW subband 3.5-3.75 MHz. Segments of 35 kHz or more often exist with no audible signals whatever, during periods when the 3.75-4.0 MHz phone subband is overcrowded with severe interference on nearly all signals, especially in the General class portion. I observe similar conditions within the 7.0-7.3 MHz band.

I am concerned that users of other radio services in ITU Region Two may consider the CW portions of the US amateur bands "underutilized" and exert pressure at future international radio conferences to reallocate amateur spectrum for non-amateur use. I urge the Commission to modify the U.S. subband structure so that the level of usage on each amateur band is more uniform throughout the entire band. This will relieve congestion that exists on the phone bands and still leave sufficient spectrum for users of narrow-band modes to operate without undue interference.

The proposed expansion of phone privileges under RM-10413 is insufficient to make a substantial difference in existing levels of interference or underutilization. As a minimum, I would propose to expand the phone subbands to 3.6, 7.1 and 21.1 MHz or below.

Furthermore, most nations of the world other than the United States have discarded the concept of government mandated amateur subbands altogether. One of the most recent countries to eliminate subbands is Canada. The U.S. subband structure, which includes separation by licence class as well as by emission modes, remains unnecessarily complex and discourages the most efficient use of the amateur frequency spectrum in this country. Any necessary separation by emission mode can be satisfactorily accomplished by voluntary band plans agreed upon by the amateur community, much in the same manner that vhf/uhf repeater interference has been alleviated by the present-day coordination program. Band plans relieve the government from the burden of enforcing what are essentially internal matters within the amateur radio community, while allowing amateurs the flexibility of adapting to changing technology and operating conditions without going through the cumbersome rulemaking process.

One of the arguments against further expansion of the phone segments has been that the "CW" bands, while presently underutilized, make up a reserve of frequency allocation that will be available for new digital technologies that might be developed in the future. However, the longstanding concept of amateur subbands has separated modes by both type of emission and bandwidth. The narrow bandwidth modes such as cw and PSK31 occupy lower parts of the bands while the wider bandwidth modes such as SSB, AM, FM and slow-scan TV occupy the upper portions. Future developments in technology could result in amateurs using digital data modes with bandwidths of several kilohertz for example, while digital voice modes could have bandwidths under 1 kHz. Operation where bandwidth best matches existing activity can be accomplished more

effectively by volunteer band plans than by rigid federal regulations, as new technologies not foreseen when rules are adopted, come into widespread use by amateurs throughout the world.

In summary, as a minimum I support expanding the voice segments to allow phone operation down to 3.6, 7.1 and 21.1 MHz, and urge the Commission to consider eliminating amateur subbands altogether thus allowing the amateur community to work out mode separation on its own, using voluntary band plans.

Respectfully submitted,

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